

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
CIVIL RIGHTS DIVISION**

**JOHN ANTHONY GENTRY,**  
**sui juris/pro se,**

**Plaintiff,**

**vs.**

**THE STATE OF TENNESSEE; PAMELA  
ANDERSON TAYLOR; BRENTON  
HALL LANKFORD; SARAH RICHTER  
PERKY; UNNAMED LIABILITY  
INSURANCE CARRIER(S); et al.**

**Defendants.**

**NO. 3:17-cv-0020  
JURY TRIAL DEMANDED**

**DEFENDANT’S MOTION FOR AN EXTENSION OF TIME TO FILE A RESPONSE TO  
THE PLAINTIFF’S AMENDED COMPLAINT**

Come now your Defendant, Sarah Richter Perky (“Defendant”), and pursuant to Rule 6 and 16, Fed. R. Civ. P., respectfully moves this Court for an extension of time until Monday, April 17, 2017 for Defendant to file a response or otherwise plead in accordance with Rules 12 and 56, Fed. R. Civ. P., to the Plaintiff’s Amended Complaint in this case.<sup>1</sup> Defendant would show the Court that Defendant believes this motion for an extension is timely and it will not unduly delay the proceedings. No prejudice will occur to Plaintiff by such an extension. Defendant believes a response to the First Amended Complaint is currently due on or about April 10, 2017. Defendant requests additional time to review Plaintiff’s two amended Complaints, as well as the other pending motion before the Court. Defendant’s counsel also requests additional

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<sup>1</sup> Plaintiff filed a First Amended Complaint (Docket Entry 32) on March 16, 2017. Plaintiff filed a Second Amended Complaint on March 27, 2017 (Docket Entry 36). The latter document is 101 pages in length. The former document is 72 pages in length. It is unclear whether Plaintiff was permitted to file the Second Amended Complaint without leave of Court.

time to confer with Defendant concerning an appropriate response. It is presently unknown whether Plaintiff opposes this extension.

Wherefore, Defendant respectfully requests an extension of time to file a response or otherwise plead to the Amended Complaint until and including Monday, April 17, 2017.

Respectfully submitted,

BUTLER SNOW LLP

By: /s/William S. Walton  
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*Attorneys for the Defendant Sarah Richter  
Perky*

**CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify that on April 3, 2017, a true and correct copy of the foregoing document has been mailed electronically via the Court's electronic filing system to the following:

John A. Gentry, CPA, pro se  
208 Navajo Court  
Goodlettsville, TN 37072

Stephanie A. Bergmeyer  
Office of the Attorney General and Reporter  
P.O. Box 20207  
Nashville, TN 37202-0207

William S. Walton